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September 25, 2024

BY ECF

The Honorable Cathy Seibel
United States District Judge
Southern District of New York
The Hon. Charles L. Brieant Jr.
Federal Building and United States Courthouse
300 Quarropas St.
White Plains, NY 10601-4150

I do not think I can modify the Judgment under Rule 35(a), but I can modify the terms of Probation under Rule 32.1(c) and 18 USC 3563(c). Pursuant to those provisions, the terms of Mr. Ayala's probation are hereby modified to permit him to travel to Rhode Island, New York, New Jersey and Connecticut to visit his son and see his son's games, as long as he provides his supervising Probation Officer whatever notice and details that Officer requests.

SO ORDERED.


CATHY SEIBEL, U.S.D.J.

9/25/24

Re: *United States v. Angel Ayala*, 21 Cr. 803 (CS)

Dear Judge Seibel:

We write to respectfully request a modification of Mr. Ayala's probation to permit travel to Rhode Island, New York, New Jersey and Connecticut. During Mr. Ayala's pre-trial release during which he was reporting at the same Probation Office in Taunton, Massachusetts, this travel was permitted and so we did not make this request at the time of sentence. When Mr. Ayala reported to Probation after his sentencing, he was advised that this travel would not be permitted unless authorized by the Court.

Mr. Ayala's son attends high school in Middletown, Rhode Island and Mr. and Ms. Ayala visit him often. Their son is also in the MLS Next Soccer League and has games in Connecticut, New York and New Jersey. We ask that Mr. Ayala be permitted to travel to these states in order to visit his son at school and attend these games and that the judgment be amended to reflect this.

The Government has no objection to this request.

Thank you for your consideration of this request.

Respectfully submitted,

/s/ James Kousouros
James Kousouros, Esq.
Counsel for Mr. Ayala

c.c.

James Ligtenberg
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Assistant United States Attorneys

Department of Probation